

computer, phone, and other electronic media. *United States v. Brien*, 617 F.2d 299, 309 (1st Cir. 1980).

In conducting the search pursuant to an invalid warrant, the agents violated Minang's rights under the Fourth Amendment to the United States Constitution. All evidentiary fruits of the search including physical evidence and statements should be suppressed as fruit of the poisonous tree. *Wong Sun v. United States*, 371 U.S. 471, 487-488 (1963).

WHEREFORE, the defendant respectfully requests that his Motion To Suppress be granted. In the alternative, the defendant requests a hearing on this issue pursuant to *Franks v. Delaware*, *supra*.

Dated: May 30, 2018

Respectfully submitted,
YANNICK MINANG
By and through his attorney,

/s/ R. Bradford Bailey
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Certificate of Service

I, R. Bradford Bailey, hereby certify that on this the 30th day of May, 2018, I caused a true copy of the foregoing *Defendant's Motion to Suppress Evidence* to be served upon all necessary parties to this matter by virtue of electronically filing the same via the CM/ECF system.

/s/ R. Bradford Bailey
R. Bradford Bailey